

Exhibit B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEM YIELD BAHAMAS LIMITED and GEM
GLOBAL YIELD LLC SCS,

Petitioners,

v.

MULLEN TECHNOLOGIES, INC. and
MULLEN AUTOMOTIVE, INC,

Respondents.

Civil Action No. 1:24-cv-01120-KPF

**JUDGMENT CREDITORS FIRST SET OF INTERROGATORIES
TO JUDGMENT DEBTORS**

Pursuant to Rule 69(a)(2) and Rule 33 of the Federal Rules of Civil Procedure, Judgment Creditors GEM Global Yield LLC SCS and GEM Yield Bahamas Limited (collectively, “GEM” or “Judgment Creditors”) request that Judgment Debtors Mullen Technologies, Inc., and Mullen Automotive, Inc. (collectively, “Mullen”, “Judgment Debtors” or “You”) respond to the following interrogatories within fifteen (15) days of service of these interrogatories.

If the answer to any interrogatory is fully and fairly contained in a document, from which the answer can without unreasonable difficulty be extracted, you may answer the interrogatory by attaching a copy of such document.

The answers to these interrogatories shall be served on counsel for GEM at EVERSHEDES SUTHERLAND (US) LLP (Attn: Frank Nolan), 1114 Avenue of the Americas, The Grace Building, 40th Floor, New York, New York 10036.

Definitions

1. The term “You” or “Your” includes Mullen Technologies, Inc. and Mullen

Automotive, Inc, and all of their shareholders, members, current and former employees, agents, and attorneys.

2. “Action” shall mean the above-captioned proceeding.

3. “Asset” means any property or thing of value you owned, claimed, or held any interest in, in whole or in part, including any and all real property, tangible personal property including cash, automobiles, machinery, equipment, boats, precious metals, jewelry, furniture, and fixtures, and intangible personal property including accounts receivable, notes receivable, stocks, bonds, and other securities, retirement accounts, pensions, annuities, copyrights, patents, insurance policies, and trusts and wills for which you may be a beneficiary.

4. The term “Relevant Time Period” includes September 27, 2021 through the present.

5. “Judgment” means the judgment entered against You in this Action on February 13, 2025.

6. All terms used herein, including but not limited to the terms “document,” “communication,” “person,” “concerning,” and “relating to,” have the broadest meaning accorded to them under Fed. R. Civ. P. 33, 34 and 45, and all information should be provided in accordance with the Federal Rules and Local Rules.

7. The terms “and,” “or,” and “and/or” as used herein have both conjunctive and disjunctive meanings.

INTERROGATORIES

1. Describe and state the location of each piece of real estate in which you own any interest.

2. Give the names, addresses, and a description of the nature of any business venture in which You own any interest.

3. List the names, addresses, and telephone numbers of all persons or entities who owe money to you and specify amounts owed.

4. List the names and addresses of all banks or savings institutions where you have any sums of money deposited and identify the accounts by number.

5. List and give the present location of all items of fixtures, furniture, machinery, equipment, vehicles, and personal property owned by you that have a value of more than \$100.

6. Identify each shareholder, member, or partner owning any of Your common stock, preferred stock, or other equity interest, as well as the percentage ownership interest of each shareholder.

7. Identify each of Your officers and their title.

8. Identify each of Your directors.

9. Identify all individuals who participated in or contributed to the responses to these interrogatories or to the requests for production of documents served herewith.

10. Have you directly or indirectly transferred, conveyed or disposed of any cash, assets or other items of value with a cost or fair market value of \$100.00 or more during the relevant time period? If your answer to this interrogatory is affirmative, provide the following information for each item:

- a. Name and address of the transferee
- b. Description of the transferee
- c. Property or asset transferred
- d. Date of transfer
- e. Fair market value at the time of transfer
- f. Consideration received

g. Your relationship to the transferee

11. Have you any other assets or an interest in assets, either actual or contingent, other than those listed in the previous interrogatory? If so, please describe the assets in detail, identify the location of the asset, and state the current fair market value of each such asset.

Dated: March 24, 2025

s/ Francis X. Nolan, IV

Francis X. Nolan, IV

EVERSHEDS SUTHERLAND (US) LLP

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Counsel for Judgment Creditors/Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Judgment Creditors First Set of Interrogatories to Judgment Debtors, was served on March 24, 2025, via e-mail, on all counsel or parties of record who have appeared in this action.

s/ Francis X. Nolan, IV

Francis X. Nolan, IV